

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CRIMINAL No. : 11-10200**

UNITED STATES OF AMERICA  
v.  
MARCEL HENDERSON

**RENEWED MOTION TO WITHDRAW AS APPOINTED COUNSEL FOR THE  
DEFENDANT AND TO APPOINT A NEW ATTORNEY TO REPRESENT HIM.**

The undersigned attorney renews her motion at the request of the defendant, to withdraw as counsel in this matter. Mr. Henderson further renews his motion that the Court appoint a new attorney to represent him in these proceedings. Mr. Henderson recently filed a letter with this Court detailing his grievances against the undersigned attorney who is stand by counsel for him. [Docket No. 156]. The attorney does not intend to respond to those statements unless required to do so by the Court. However, the letter demonstrates hostility and complete lack of trust by the defendant which makes even the role of “stand-by counsel” difficult to accomplish.

Although a defendant is not entitled to serial attorneys appointed by the Court, *United States v. Mathias*, Mr. Henderson should be given another attorney to assist him in the trial. Although the docket shows that the undersigned attorney is the fifth attorney of record, two of the attorneys withdrew for their own personal reasons. ( One had his licence suspended and the other became a judge).

Mr. Henderson is charged as a felon in possession of a firearm. The government has asserted that he is an armed career criminal and, if convicted, would face a mandatory minimum sentence of incarceration of at least fifteen years. Mr. Henderson is not trained as an attorney but will be subject to the rules and procedures as an attorney. He has the right to represent himself but he should at least have a working relationship with his standby counsel. The appointment of

counsel will also benefit the Court so that the proceedings are smooth and more efficient.

WHEREFORE : The defendant prays that the Court grant this motion.

Respectfully Submitted,

/s/ Lenore Glaser  
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June 27, 2014

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### **CERTIFICATE OF SERVICE**

I, Lenore Glaser, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on :June 27, 2014

/s/ Lenore Glaser